

Mountain Valley Pipeline, LLC  
v. Easements to Construct, etc., et al.

Exhibit 2  
to Plaintiff's Motion for an Award of Attorney's Fees and Expenses  
Against John Doe and Jane Doe Tree-Sitters

Declaration of Matthew P. Pritts

IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

MOUNTAIN VALLEY PIPELINE, LLC, )  
  )  
Plaintiff,                         )  
  )  
v.                                     )                                      Case No. 7:17cv492-EKD  
  )  
EASEMENTS TO CONSTRUCT, OPERATE, )  
AND MAINTAIN A NATURAL GAS        )  
PIPELINE OVER TRACTS OF LAND IN    )  
GILES COUNTY, CRAIG COUNTY,        )  
MONTGOMERY COUNTY, ROANOKE      )  
COUNTY, FRANKLIN COUNTY, AND     )  
PITTSYLVANIA COUNTY, VIRGINIA,    )  
*et al.*,                             )  
  )  
Defendants.                         )

DECLARATION OF MATTHEW P. PRITTS

I, Matthew P. Pritts, declare as follows:

1. I am an attorney licensed in Virginia and a partner with the law firm of Woods Rogers PLC. I graduated from the Washington and Lee University School of Law in 1992 and have practiced law for more than 25 years. I have extensive experience representing clients in eminent domain matters and other commercial litigation.

2. I have reviewed the declaration of Wade W. Massie that is being filed in support of the motion for attorneys' fees against Ian Reilly and Carolyn Reilly and his declaration in support of the motion for attorneys' fees against the tree-sitters.

3. I have also reviewed the following pleadings in the case:

- Dkt. No. 791 – Motion to Enforce Injunction on MVP Parcel Number VA-FR-076.01
- Dkt. No. 813 – Order to Show Cause Regarding MVP Parcel No. VA-FR-076.01
- Dkt. No. 840 – Response to Motion to Enforce Injunction on MVP Parcel Number VA-FR-076.01
- Dkt. No. 844 – Reply to Response to Motion To Enforce Injunction to Enforce Injunction on MVP Parcel Number VA-FR-076.01
- Dkt. No. 848 – Witness and Exhibit List
- Dkt. No. 863 – Memorandum Opinion
- Dkt. No. 864 – Order
- Dkt. No. 875 – Motion to Enforce Injunction on MVP Parcel Number VA-FR-076.01 as to Tree-Sitter
- Dkt. No. 885 – Order to John or Jane Doe to Show Cause
- Dkt. No. 896 – Exhibit List
- Dkt. No. 897 – Memorandum Opinion
- Dkt. No. 898 – Order

4. In my opinion, the hours and rates described by Mr. Massie in his declarations are reasonable for the work performed, and the rate is at or below the market for such work in the Roanoke area.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12<sup>th</sup> day of June, 2018.



Matthew P. Pritts